

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
ANTHONY MENDES	)	
AND DORIS MENDES,	)	
	)	
Plaintiffs,	)	C.A. No.: 05-11765-DPW
	)	
v.	)	
	)	
CENDANT MORTGAGE,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STATEMENT**

Pursuant to Federal R. Civ. P. 16(b) and Local Rule 16.1, Plaintiffs, Anthony and Doris Mendes, and Defendant, Cendant Mortgage (now PHH Mortgage Corporation), hereby submit their Joint Statement.

**Pretrial Schedule**

**I. Proposed Discovery Schedule**

- |    |   |                   |
|----|---|-------------------|
| 1. | Complete Automatic Disclosures  | November 2, 2005  |
| 2. | Initial Document Requests And Interrogatories Served  | December 31, 2005 |
| 3. | Requests for Admissions Served  | May 8, 2006       |
| 4. | Supplemental Document Request and Interrogatories Served  | May 8, 2006       |
| 4. | Non-Expert Depositions Completed  | May 8, 2006       |
| 5. | Disclosure of experts pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure Completed | June 9, 2006      |
| 6. | Rebuttal To Expert Reports  | July 10, 2006     |

6. Expert Depositions Completed August 11, 2006

**II. Proposed Motion Schedule**

1. Motions To Amend Pleadings Filed By March 10, 2006

2. Oppositions to Motions To Amend Filed By March 31, 2006

3. Dispositive Motions Filed By July 10, 2006

4. Oppositions to Dispositive Motions Filed By July 31, 2006

Respectfully submitted,

ANTHONY AND DORIS MENDES

By their attorney,  
LAW OFFICE OF CHRISTOPHER J. TROMBETTA

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PHH Mortgage Corporation,  
f/k/a/ Cendant Mortgage,

By its attorneys,

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Dated: October 11, 2005